

EXHIBIT A

**IN THE UNITED STATE DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

ABRAHAM KAFF, ARI PFEFFER, and
RAQUEL JAGER on behalf of themselves and
all others similarly situated consumers

Plaintiffs,

v.

NATIONWIDE CREDIT, INC.

Defendant.

CLASS ACTION

NO. 13-cv-5413 (SLT-PK)

DECLARATION OF AMY TADEWALD

I, Amy Tadewald, declare as follows:

1. I am a Senior Project Manager for Rust Consulting, Inc. (“Rust”). My business address is 625 Marquette Avenue, Suite 880, Minneapolis, Minnesota 55402-2469. My telephone number is (612) 359-2031. I am over twenty-one years of age and am authorized to make this declaration on behalf of Rust and myself.

2. Rust has extensive experience in class action matters, having provided services in class action settlements involving antitrust, securities fraud, property damage, employment discrimination, employment wage and hour, product liability, insurance and consumer issues. We have provided notification and/or claims administration services in more than 4,500 cases. Of these, more than 1,700 were Labor & Employment cases.

3. Rust was engaged by Counsel for the Plaintiffs and Counsel for the Defendant (collectively the “Parties”) to provide notification services in the *Abraham Kaff, et al., v. Nationwide Credit, Inc.*, Settlement (the “Settlement”). Duties include: a) preparing, printing and mailing of the *Notice of Settlement of a Class Action* (“Class Notice”); b) receiving and reviewing Proof of Claim Forms (“Claim Forms”) submitted by Class Members; c) tracking of written requests for exclusion; d) drafting and mailing Settlement Award checks to Class Members after the Final Judgment Date; and e) for such other tasks as the Parties mutually agree or the Court orders Rust to perform.

4. Rust obtained a mailing address of Kaff v Nationwide Credit Class Administrator, c/o Rust Consulting, Inc. - 5210, P.O. Box 3065012, Des Moines, IA 50306-5012 to receive Claim Forms, written

requests for exclusion, objections, undeliverable Class Notices and other communications regarding the Settlement.

5. Rust obtained a toll-free phone number of (866) 647-4187 to provide Class Members with information pertaining to the Settlement via an IVR or by speaking to a live operator. The IVR provided a recorded message including a brief summary of the Settlement and the option to select one of several detailed recorded messages addressing frequently asked questions. It also provides Class Members with an opportunity to be transferred to a live operator.

6. A website, www.kaffvnationwidecredit.com, was created for Class Members to view, download and/or print the Website Notice of Class Action Settlement, Class Action Settlement Agreement, and Claim Form.

7. On or about June 2, 2016, Rust received text for the Notice and Claim Form from Counsel. A draft of the formatted Class Notice was prepared by Rust and approved by the Parties.

8. On or about June 9, 2016, Counsel for the Defendant provided Rust with a mailing list containing the Class Member's names and last known addresses (the "Class List"). The Class List contained data for 76,843 potential Class Members. Included in the 76,843 potential Class Member records were 268 records where the name and address combination was an exact duplicate of another record. At the direction of Counsel for the Defendant, 134 duplicate records were excluded from the Class Notice mailing.

9. The mailing addresses contained in the Class List were processed and updated utilizing the National Change of Address Database ("NCOA") maintained by the U.S. Postal Service. The NCOA contains requested changes of address filed with the U.S. Postal Service. In the event that any individual had filed a U.S. Postal Service change of address request, the address listed with the NCOA would be utilized in connection with the mailing of the Class Notice.

10. On July 7, 2016, Class Notices were mailed to 76,709 Class Members contained in the Class List via First Class mail. The Class Notice advised Class Members that they could submit a Claim Form, written request for exclusion or objection postmarked by August 16, 2016.

11. As of this date, 13,317 total Class Notices have been returned as undeliverable. Of the 13,317 total Class Notices returned as undeliverable, Rust performed address traces on 10,395 Class Notices and did not trace 2,922 Class Notices (as 811 of the undeliverable Class Notices were returned as undeliverable a

second time from a previously traced address and 2,111 undeliverable Class Notices were received after the deadline). Of the 10,395 Class Notices which were traced, Rust obtained a more current address for 4,848 Class Notices and Class Notices were promptly re-mailed to those Class Members via First Class mail. Of the 10,395 Class Notices which were traced, more current addresses were not obtained for 5,547 Class Notices and they remain undeliverable. As of today, there are a total of 8,469 undeliverable Class Notices (811 which were returned as undeliverable a second time after being re-mailed to a traced address, 2,111 were received after the deadline and not traced, and 5,547 which were traced but no updated address was identified).

12. As of this date, 127 Class Notices were returned by the Post Office with forwarding addresses attached. Rust promptly re-mailed Class Notices to those Class Members via First Class mail.

13. As of this date, Rust has received Claim Forms from 1,997 Class Members. Of these 1,997 Claim Forms received, 1,912 Claim Forms were received with postmark dates on or before August 16, 2016. Of the 1,997 Claim Forms received, 76 Claim Forms were received with a postmark date of August 17, 2016 or later and received by Rust on or before September 16, 2016. Of the 1,997 Claim Forms received, nine (9) Claim Forms were received by Rust after September 16, 2016.

14. Of the 1,997 Claim Forms received, 86 Claim Forms were received without a signature. Rust mailed letters to the 86 Class Members requesting they complete and return an updated Claim Form. Of the 86 Class Members who were mailed letters, 13 Class Members submitted updated Claim Forms and 73 Claim Forms remain unsigned.

15. The Parties have agreed to accept Claim Forms received by Rust on or before September 16, 2016 and Claim Forms without a signature. Therefore, of the 1,997 Claim Forms received, 1,988 Claim Forms are considered complete and timely and nine (9) Claim Forms are considered complete and untimely.

16. As of this date, Rust has received written requests for exclusion from 29 Class Members. Of the 29 written requests for exclusion received, 28 are considered timely and one (1) is considered untimely. Attached as Exhibit A is a true and correct list of the 28 Class Members who submitted timely written requests for exclusion.

17. As of this date, one (1) objection has been received by Rust. Attached as Exhibit B is a true and correct list of the Class Member who submitted an objection.

18. The total cost for the administration of this Settlement, including fees incurred and future costs for completion of the administration is estimated to be \$111,012.

19. I declare under penalty of perjury under the laws of the State of New York and the United States that the above is true and correct to the best of my knowledge and that this Declaration was executed this 30th day of September 2016, at Minneapolis, MN.



AMY TADEWALD

EXHIBIT A

Sequence	Name
1	JUDIE WHITE
2	SHLOIME SPIRA
3	SARAH PODRIGAL
4	EPHRAIM STEINWURZEL
5	ENITH ARIAS
6	MIRI BRECHER
7	AARON NOTIK
8	ALEXANDER SCHAECHTER
9	CATHERINE MONDRALA
10	FERNANDO GONZALEZ
11	MELISSA MAHLER
12	HELENE MILLS
13	GALINA SERGEEVA
14	DIANE JERULEVICH
15	JUDAH YABLONSKY
16	ELI REIFER
17	JOSEPH PULEO
18	THOMAS MARASCIA
19	ARI HOFSTATTER
20	LYDIA RODRIGUEZ
21	YITZCHOK STERN
22	MARY JANUS
23	IGOR LUBAVSKY
24	JUANITA VELEZ
25	ROBERT BRADT
26	RACHEL FREILICH
27	ELAINE LAWRENCE
28	KARIN DOGNY

EXHIBIT B

Sequence	Name
1	ANTHONY CARFIZZI